

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

ALAN GOLDMAN,

Plaintiff

v.

McCONNELL VALDÉS, LLC;

ANTONIO A. ARIAS-LARCADA, his wife

MARIA BEALE, and the Conjugal

JOHN DOE; MARY DOE

SOMPO INTERNATIONAL INSURANCE

COMPANY; ENDURANCE AMERICAN

SPECIALTY INSURANCE COMPANY;

AIG INTERNATIONAL COMPANY-PUERTO RICO

Defendants

* CIVIL NO.: 24cv01136

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EXHIBIT 4

ZONING MAP

The attached map of the Capital City of Montpelier, Vermont, clearly depicts the extensive properties owned and controlled by Mr. Goldman. These holdings include critical developable land, underscoring the essential role of Mr. Goldman's participation in the City's once-every-eight-years planning process. Without his direct involvement, Montpelier—already facing a severe housing crisis exacerbated by the catastrophic July 2024 flooding—risks further deepening its acute shortage of housing.

Mr. Goldman's developable lands as a whole of Montpelier
Consist of the following:

NOTE:

1-1 is the Capital Complex

(Capitol Building, Supreme Court, Congress, Governors Offices etc.)

11-2 and 11-8 are known as Crestview: 200 plus acres Zoned the Res 9000 District where most of the mixed development will happen

13-6 = Crestview also has 110 acres that goes into the neighboring community of Middlesex

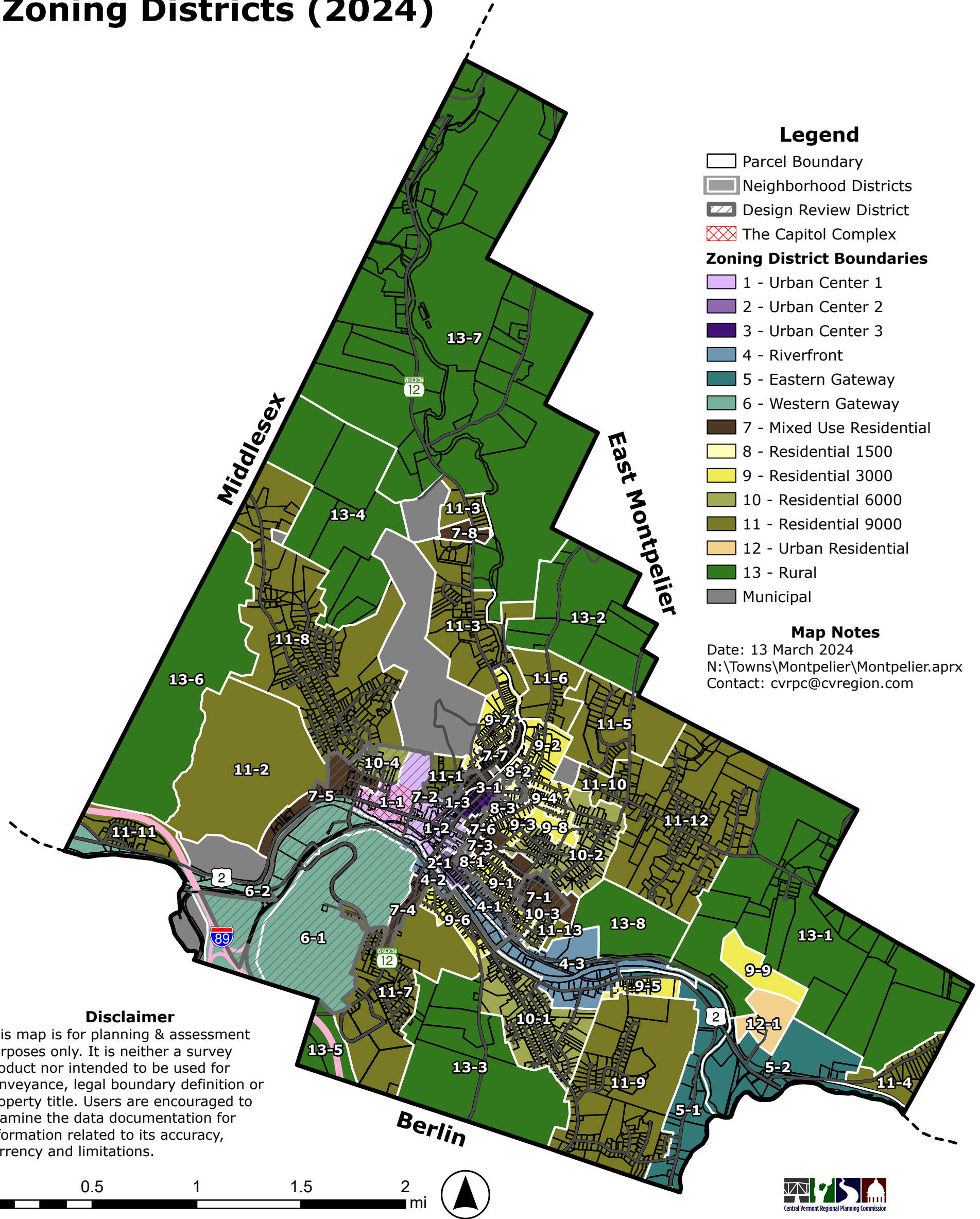
7-5 = Redstone Mansion: 10.5 acres Zoned the MUR District is the park entrance, living quarters, learning facility and parking area.

4-3 = Sabin's Pasture. Zoned the Riverfront Development District is 15 acres where 300 plus units and mixed growth will be developed.

13-8 = Sabin's Pasture: Zoned the Rural District is 85 acres where High End housing will be built.

<https://www.montpelier-vt.org/DocumentCenter/View/10726/Zoning-District-Map-as-amended-rough-04-03-2024>

Zoning Districts (2024)



ID	Neighborhood	ID	Neighborhood	ID	Neighborhood	ID	Neighborhood
1-1	Civic	7-4	Northfield Street- North	9-7	The Meadow - West	11-9	Stonewall Meadows
1-2	Downtown Business	7-5	Redstone	9-8	Heaton Street	11-10	Towne Street
1-3	Elm Street- Urban	7-6	School Street	9-9	Country Club Residential	11-11	Toy Town
2-1	Barre Street- West	7-7	The Meadow - Elm St	10-1	Berlin Street	11-12	Towne Hill
3-1	Main Street	7-8	CCV	10-2	College Hill - North	11-13	College Pasture
4-1	Barre Street- East	8-1	Blanchard Park	10-3	College Hill - Southeast	12-1	Country Club Center
4-2	Cross Roads	8-2	Franklin Street - Southwest	10-4	Redstone- North	13-1	Eastern Rural
4-3	Route 2	8-3	Liberty Street - West	11-1	Cliffside	13-2	Highland
5-1	Eastern Corridor	9-1	College Hill - South	11-2	Crestview	13-3	Hill Street
5-2	Farm and Factory	9-2	Franklin Street - Northeast	11-3	Elm Street	13-4	Pembroke Heights
6-1	Office Park	9-3	Liberty Street - East	11-4	Gallison Hill	13-5	Southwestern Rural
6-2	Western Corridor	9-4	Main St- East	11-5	Murray Hill	13-6	Western Rural
7-1	College Hill - East State St	9-5	River Street	11-6	North Street	13-7	Wrightsville
7-2	Court Street	9-6	Route 2 - Prospect St	11-7	Northfield Street	13-8	Sabin's Pasture
7-3	Lower East State Street	9-7	The Meadow - West	11-8	Park West		

Unofficial Property Record Card - Montpelier, VT

General Property Data

Parcel ID	155-108000	Account Number	405-126-11202
Prior Parcel ID	155 --		
Property Owner	GOLDMAN ALAN B	Property Location	1014 TERRACE ST
		Property Use	RESD 2
Mailing Address	PO BOX 158	Most Recent Sale Date	12/23/2015
		Legal Reference	670-867
City	PLAINFIELD	Grantor	TERRACE ST REALTY TR
Mailing State	VT	Sale Price	154,000
Zip	05667-0158	Land Area	516.430 acres
ParcelZoning			

Current Property Assessment

Card 1 Value	Building Value	283,000	Xtra Features Value	86,100	Land Value	1,534,300	Total Value	1,903,400
Total Parcel Value	Building Value	336,900	Xtra Features Value	86,100	Land Value	1,534,300	Total Value	1,957,300

Building Description

Building Style	OLD STYLE	Foundation Type	MASONRY	Flooring Type	HARDWOOD
# of Living Units	1	Frame Type	WOOD	Basement Floor	CONCRETE
Year Built	1900	Roof Structure	FLAT	Heating Type	STEAM
Building Grade	AVG. (+)	Roof Cover	MEMBRANE	Heating Fuel	OIL
Building Condition	Average	Siding	WOOD SHING	Air Conditioning	0%
Finished Area (SF)	2712	Interior Walls	DRYWALL	# of Bsmt Garages	0
Number Rooms	12	# of Bedrooms	4	# of Full Baths	2
# of 3/4 Baths	0	# of 1/2 Baths	1	# of Other Fixtures	0

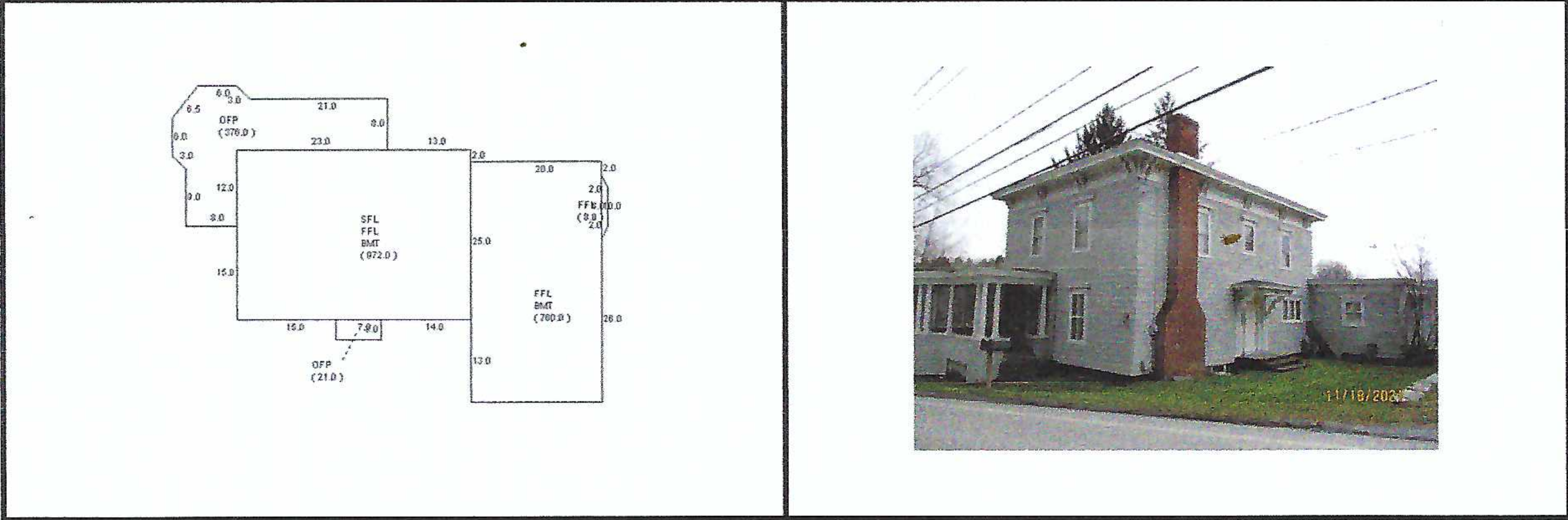
Legal Description

516.43 ACRES & DWL; INCL 115-108 @ 163.7 AC, 115-118 @ 24.4 AC, 123-030 @ 324.0 AC, 2 LOTS @ 4.31 AC

Narrative Description of Property

This property contains 516.430 acres of land mainly classified as RESD 2 with a(n) OLD STYLE style building, built about 1900 , having WOOD SHING exterior and MEMBRANE roof cover, with 1 unit(s), 12 room(s), 4 bedroom(s), 2 bath(s), 1 half bath(s).

Property Images



Disclaimer: This information is believed to be correct but is subject to change and is not warranted.

Unofficial Property Record Card - Montpelier, VT

General Property Data

Parcel ID 500-072000
Prior Parcel ID 500 --
Property Owner GOLDMAN ALAN B

Mailing Address PO BOX 158

City PLAINFIELD
Mailing State VT Zip 05667
ParcelZoning

Account Number 405-126-13232

Property Location 26 TERRACE ST
Property Use COMMERCIAL
Most Recent Sale Date 4/26/2019
Legal Reference 692-324
Grantor VERMONT, STATE OF
Sale Price 1,100,500
Land Area 10.140 acres

Current Property Assessment

Card 1 Value Building Value 841,800 Xtra Features Value 0 Land Value 356,800 Total Value 1,198,600

Building Description

Building Style OFFICE
of Living Units 1
Year Built 1890
Building Grade GOOD (-)
Building Condition Average
Finished Area (SF) 7410
Number Rooms 0
of 3/4 Baths 0

Foundation Type CONCRETE
Frame Type MASONRY
Roof Structure GABLE
Roof Cover STDG SEAM
Siding BRICK
Interior Walls PLASTER
of Bedrooms 0
of 1/2 Baths 3

Flooring Type CARPET
Basement Floor CONCRETE
Heating Type FORCED H/W
Heating Fuel OIL
Air Conditioning 100%
of Bsmt Garages 0
of Full Baths 0
of Other Fixtures 0

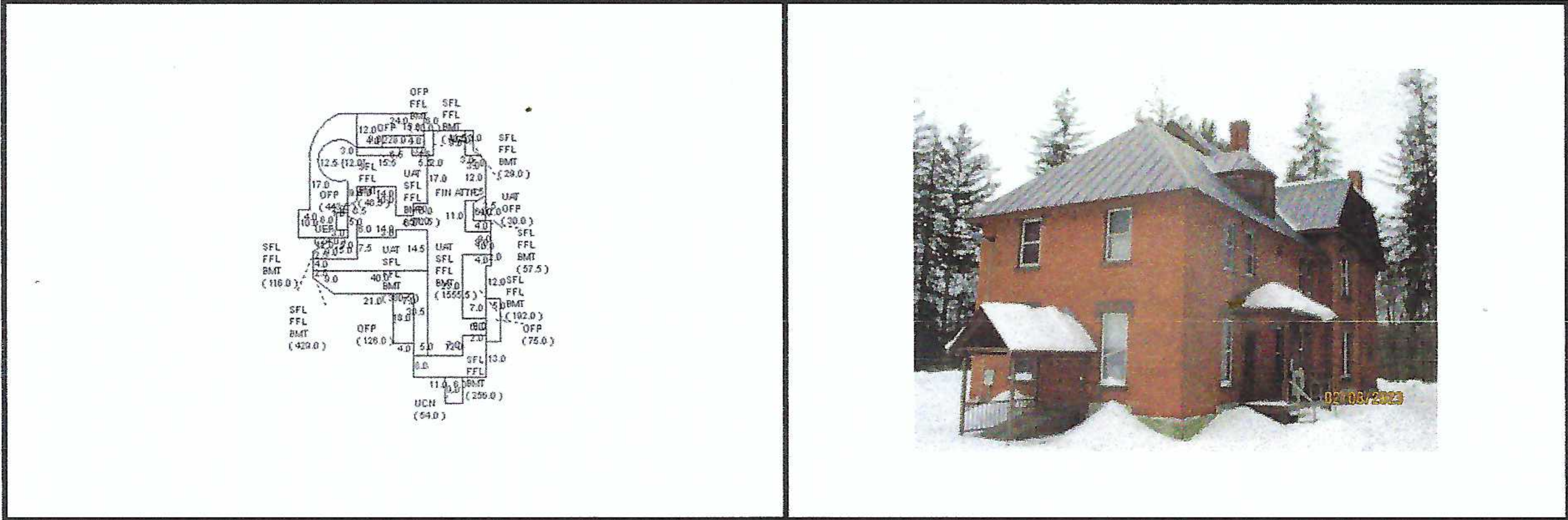
Legal Description

10.14 ACRES & REDSTONE BLDG

Narrative Description of Property

This property contains 10.140 acres of land mainly classified as COMMERCIAL with a(n) OFFICE style building, built about 1890 , having BRICK exterior and STDG SEAM roof cover, with 1 unit(s), 0 room(s), 0 bedroom(s), 0 bath(s), 3 half bath(s).

Property Images



Disclaimer: This information is believed to be correct but is subject to change and is not warranted.

Unofficial Property Record Card - Montpelier, VT

General Property Data

Parcel ID	004-369A00	Account Number	405-126-13473
Prior Parcel ID	004 --		
Property Owner	PERRO PINTO LLC GOLDMAN ALAN B	Property Location	BARRE ST
Mailing Address	@ PERRO PINTO LLC 8 JUDSON DR	Property Use	MISC LAND
City	MONTPELIER	Most Recent Sale Date	4/26/2022
Mailing State	VT	Legal Reference	712-171
Zip	05602	Grantor	ZORZI, DOUGLAS M TRUST
ParcelZoning		Sale Price	0
		Land Area	94.140 acres

Current Property Assessment

Card 1 Value	Building Value 0	Xtra Features Value 0	Land Value 1,099,500	Total Value 1,099,500
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Building Description

Building Style	Foundation Type	Flooring Type
# of Living Units 0	Frame Type	Basement Floor N/A
Year Built N/A	Roof Structure	Heating Type N/A
Building Grade	Roof Cover	Heating Fuel N/A
Building Condition N/A	Siding	Air Conditioning 0%
Finished Area (SF) N/A	Interior Walls N/A	# of Bsmt Garages 0
Number Rooms 0	# of Bedrooms 0	# of Full Baths 0
# of 3/4 Baths 0	# of 1/2 Baths 0	# of Other Fixtures 0

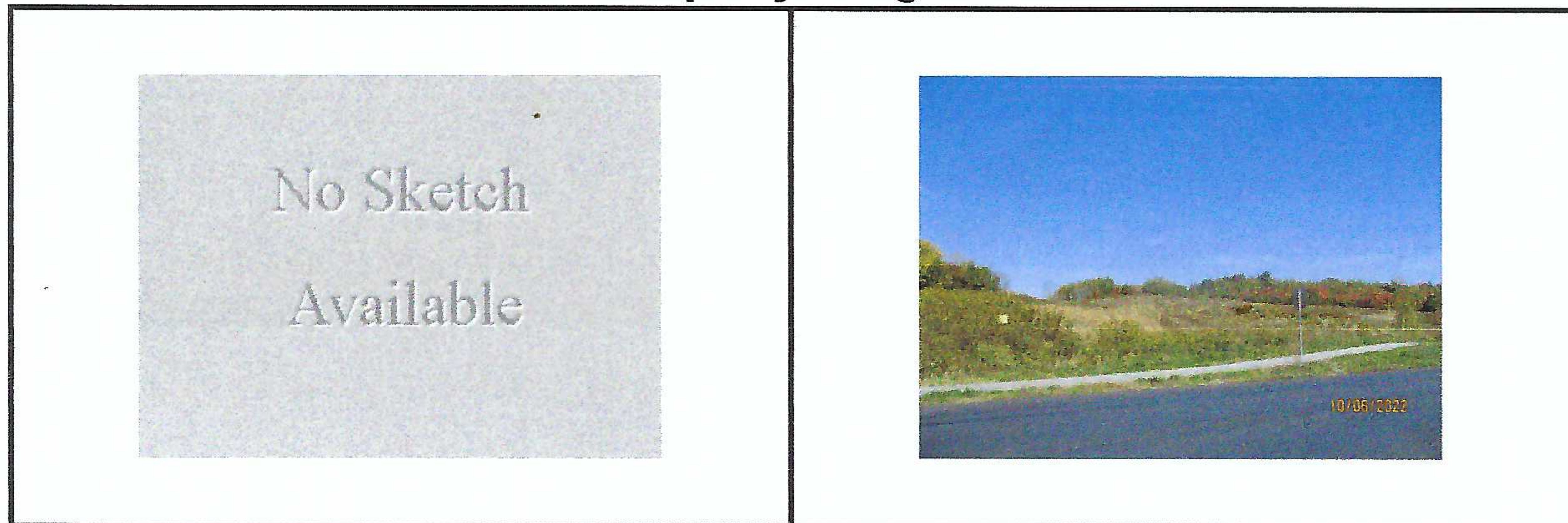
Legal Description

94.14 ACRES

Narrative Description of Property

This property contains 94.140 acres of land mainly classified as MISC LAND with a(n) style building, built about N/A , having exterior and roof cover, with 0 unit(s), 0 room(s), 0 bedroom(s), 0 bath(s), 0 half bath(s).

Property Images



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